



UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

RACHEL LEE FLYNN,

Defendant.

Criminal No. 3:22-CR- 45
Violations: 18 U.S.C. § 922(a)(6)
18 U.S.C. § 924(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(False Statements During Purchase of Firearm)

On or about December 30, 2021, in Berkeley County, in the Northern District of West Virginia, defendant **RACHEL LEE FLYNN**, in connection with the acquisition of a firearm, a Taurus model G3C, 9mm pistol, bearing serial number ACB570606, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **RACHEL LEE FLYNN** under chapter 44 of Title 18, in that the defendant represented that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

(False Statements During Purchase of a Firearm)

On or about March 17, 2022, in Morgan County, in the Northern District of West Virginia, defendant **RACHEL LEE FLYNN**, in connection with the acquisition of a firearm, a Springfield Armory, model Hellcat 9mm pistol, bearing serial number BA304360, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **RACHEL LEE FLYNN** under chapter 44 of Title 18, in that the defendant represented that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATION

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), including a Springfield Armory, model Hellcat 9mm pistol, bearing serial number BA304360 and a Taurus, model G3C, 9mm pistol, bearing the serial number ACB570606.

A True Bill,

/s/ _____
Grand Jury Foreperson

/s/ _____
WILLIAM IHLENFELD
United States Attorney

Lara K. Ombs-Botteicher
Assistant United States Attorney